



Department of Energy
Richland Operations Office
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0065112

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Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

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EDMC

Dear Mr. Wilson:

REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN FOR
TANKS/LINES/PITS/BOXES/SEPTIC TANKS AND DRAIN FIELDS WASTE GROUP
OPERABLE UNIT, 200-IS-1 AND 200-ST-1

- References:
- (1) RL ltr. to J. B. Price, Ecology, from K. A. Klein, "Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Tanks/Lines/Pits/Boxes/Septic Tanks and Drain Fields Waste Group Operable Unit, 200-IS-1 and 200-ST-1," (05-AMCP-0200) dtd. March 16, 2005. 64068
 - (2) Ecology ltr. to M. McCormick, RL, from J. B. Price, "Re: Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Tanks/Lines/Pits/Boxes/Septic Tanks and Drain Fields Waste Group Operable Unit, 200-IS-1 and 200-ST-1," dtd. February 25, 2005. 63880

The U.S. Department of Energy, Richland Operations Office (RL) submitted the Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Tanks/Lines/Pits/Boxes/Septic Tanks and Drain Fields Waste Group Operable Unit, 200-IS-1 and 200-ST-1, Revision 1, Draft A, to the State of Washington, Department of Ecology (Ecology) on December 22, 2004. Following Ecology's review of the document, RL received a letter stating that Ecology has major issues with the Revision 1, Draft A RI/FS Work Plan. In Reference (2), Ecology suggested that these issues would be resolved using the Hanford Federal Facility and Agreement Consent Order (Tri-Party Agreement) dispute resolution provisions. The Agencies would begin the dispute resolution process on April 1, 2005, and conclude by April 30, 2005. It was also agreed that the lessons learned from the recent 200-SW-1 and 200-SW-2 collaborative workshops would be incorporated into the 200-IS-1 and 200-ST-1 Work Plan.

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RL recognizes the need to enhance the clarity of the document as well as the need for a more detailed plan to address project challenges. These will be addressed in the next revision of the RI/FS Work Plan. In addition, clear decision logic will be presented for how the 200-IS-1 waste sites will be investigated with potential "binning" logic for remedial action(s). RL is exploring applications of a combination of statistical modeling coupled with risk assessment to guide both the characterization and remediation activities and decisions. RL will involve Ecology to define the characterization and remedial decision criteria that will likely utilize the Data Quality Objectives (DQO) process. This work will be closely coordinated with both ORP and the U Plant pipeline engineering evaluation and cost analysis (EE/CA) Project. In addition, RL may perform a detailed lessons-learned for characterizing and remediating pipelines both onsite as well as offsite in order to enhance project efficiencies. It is also likely that RL will utilize the DQO process (in conjunction with Ecology) to assist in evaluating proven as well as innovative sub-surface characterization technologies.

RL is committed to continue to work collaboratively with Ecology so that the outcome is mutually acceptable to both agencies and is protective of human health and the environment. A recovery plan will be submitted to Ecology by May 31, 2005, detailing the actions needed to ensure that there are no impacts to the December 31, 2008, completion date for the 200 Area Non-Tank Farm Operable Units pre-record of decision site investigations (Tri-Party Agreement Major Milestone M-015-00C).

If there are any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein
Manager

AMCP:KDL

cc: G. Bohnnee, NPT
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Administrative Record (200-IS-1, 200-ST-1)